

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
THE KELLY FIRM, P.C. Andrew J. Kelly, Esq. 1011 Highway 71, Suite 200 Spring Lake, NJ 07762 (732) 449-0525 akelly@kbtlaw.com Attorneys/Local Counsel for Interested Party, Blue Cross Blue Shield of Massachusetts	
In Re:	Case No.: 23-12825
LTL MANAGEMENT, LLC	Chapter: 11
	Judge: MBK

ANDREW J. KELLY hereby certifies as follows:

1. I am an attorney at law of the State of New Jersey and the principal of The Kelly Firm, P.C., which has been charged with the representation of interested party, Blue Cross Blue Shield of Massachusetts (“BCBS”) in the above-captioned Chapter 11 case.

2. This certification is being filed in support of the application for *pro hac vice* admission of Elizabeth Brannen Carter, Esq. (“Ms. Carter”), an attorney admitted to practice in the State of Alabama, pursuant to D.N.J. L.Civ.R. 101.1 and D.N.J. LBR 9010-1 for the purpose of representing BCBS in the above-captioned case.

3. Ms. Carter is familiar with this case and her admission will not delay the prosecution of this matter.

4. I believe that Ms. Carter will uphold the highest standards of conduct required of an attorney in the State of New Jersey.

5. Due to Ms. Carter's attorney-client relationship with BCBS and her familiarity with the circumstances giving rise to this action, good cause exists pursuant to D.N.J. L.Civ.R. 101.1 and D.N.J. LBR 9010-1 to allow her admission *pro hac vice*.

6. I, Andrew J. Kelly, and The Kelly Firm, P.C., accept all responsibilities and obligations under L.Civ.R. 101.1 and D.N.J. LBR 9010-1 and as otherwise ordered by this Court, in the representation of BCBS in this matter.

7. I respectfully request that this Court approve BCBS's Application for *pro hac vice* admission of Ms. Carter for the purpose of representing BCBS in this matter.

I hereby certify that the foregoing statements made by me are true and that if any of the statements are found to be willfully false, I am subject to punishment.

THE KELLY FIRM, P.C.

Date: April 10, 2023

**By: /s/ Andrew J. Kelly
ANDREW J. KELLY
Attorneys for Interested Party,
BCBS of Massachusetts**